



## **Submission to the Review of the Intergovernmental Agreement on Biosecurity**

### **The IGAB**

- A successful 'national biosecurity system' requires intergovernmental collaboration, cooperation and agreement, and the IGAB does provide a framework for this to occur.
- The IGAB's consolidated priority areas align well with the 'key areas integral to a robust biosecurity system' that were identified by the Biosecurity Council of WA (the Council), via extensive stakeholder consultation\*.

### **Agreeing to risks, priorities and objectives**

- Care is needed that the biosecurity systems does not become totally reactive and pre-occupied by process (i.e. requires us to continually change to meet perceived new risks and priorities). If a robust and resilient system is developed, then the risks and priorities will change gradually. For example, the fixation on lists of threats puts us in the position of needing to be continually reviewing and changing. Stepping back and working with exemplars, which will cover all potential threats, will make decision-making more efficient the system more effective.
- The biggest risks to Australia's biosecurity system are: maintaining the specialist capability that enables and informs decision-making on threats and incursions, and the ability to undertake surveillance and response; maintaining the trained personnel and infrastructure to support biosecurity activities; effective cooperation between agencies where threats cross their responsibilities; and maintaining the research-base in risk analysis, diagnostics, surveillance, response and treatments.
- Based on Council's experience at various forums – some stakeholders understand the components/functions of the biosecurity system, but not all. "Broad engagement, education and awareness-raising" to develop and maintain widespread support for WA's biosecurity system, was a key theme that emerged from past Council consultation with stakeholders — this related to 'biosecurity' in the broad sense, and for specific biosecurity issues. It is possible that this finding may be applicable to the national system as well.
- A more integrated national approach to biosecurity (that is agreed to by key partners) will increase the potential for successfully achieving (agreed) national goals/objectives. However, there are likely impediments – particularly the differing priorities of the different jurisdictions leading to tensions and/or negatively impacting biosecurity at a jurisdiction level.

### **Embedding shared responsibility**

- Work done by the Council identified that stakeholders had relatively consistent perceptions about the broad roles and responsibilities of industry, government and communities — but were less sure of the more specific roles/responsibilities. The "shared responsibility" principle was generally accepted; however, this needs to be translated into coordinated and cooperative action, with a clear sense of direction. (Note this work done for WA – but possibly applicable nationally). The Council's work also highlighted that defining the roles and responsibilities needs to be done using a

clear/transparent/collaborative process with a sustained commitment to stakeholder engagement.

- Council stakeholder consultation identified ‘collaboration, cooperation, communication’ with key stakeholders as an important practical action to strengthen the involvement of industry and community stakeholders in the biosecurity system. This included: sharing resources; collaboration from planning to implementation; cross-agency interactions; strong, timely communications; government support to help industry to undertake its obligations.

### **Funding biosecurity**

- Council broadly agrees with the IGAB principles; however, the following points have been noted from Council work:
  - the process of prioritising is not consistently applied / clearly understood / clearly articulated – unclear prioritisation process was identified as preventing effective risk-based decision-making and investment; but a clear/transparent process can help justify why funds are spent in certain areas and not others
  - “areas of greatest return” must be used in the broad sense to incorporate environmental or social outcomes. Stakeholders put a very high level of importance on environmental outcomes. It should not all be about economic return.
- Without clear, consistent and collaborative approaches to prioritisation it is difficult to ensure investment is going into the best areas.
- In terms of alternative funding arrangements, Council consultation showed that the value of biosecurity in providing environmental benefits was well-recognised and strongly supported. The potential for an ‘environmental levy’ was raised by stakeholders, but the actual level of support for something like this has not been examined.
- In terms of ‘equitable level of investment from all stakeholders’, Council work identified the need for greater recognition of the financial costs (including consequential and direct losses) accepted by industry to abide by government biosecurity legislation and protocols; community fund-raising activities that provide funds for biosecurity-related activities; industry-driven biosecurity services; and the financial (and other) costs of voluntarily undertaking biosecurity activities.
- Council stakeholder consultation identified agreement that if a biosecurity activity provides financial benefit to an industry, then the industry should contribute to the costs; if the activities of an industry result in increased biosecurity risk, then the industry should contribute to the costs of minimising the risks.

### **Market access**

- WA’s area freedom status from pests/diseases present elsewhere in Australia is not given appropriate weight in Australia’s national biosecurity system. From a WA perspective, recognising regional differences is critical. Internationally Australia can be seen as one place, which can make it difficult for export of WA produce with a ‘free status’ to be recognised as such.
- The level of surveillance being undertaken for market access currently is unclear – anecdotal evidence is that importing countries such as China and Japan have recently questioned how independent (government sources) data are being collected to justify area freedom claims. There needs to be consideration of just how much surveillance is actually done and is it sufficient to support market access. There needs to be a measure

of the quality of data collected, and whether it will continue to meet the requirements of importing countries. Industry and citizen science can contribute but we need to be very careful as to how this is applied, as it unlikely to be accepted by importing markets.

- The recent Khapra beetle, Russian Wheat Aphid and other incursions need to be explored in more detail. They indicate that the new border measures, based on risk return, may not be meeting the objectives of IGAB. The response to the events also highlighted a limited human capacity to manage and implement the required measures. There needs to be discussion on jurisdictional responsiveness and cooperation; who should manage and take responsibility for such events – Commonwealth, States or someone else?

### **The role of research and innovation**

- Research should be ongoing. Diagnostics, surveillance, response methodologies and treatments need to be continually developed as new technology becomes available and old systems become redundant. The research tap cannot be turned on and off and still expect effective innovation. Effective national collaboration is essential in research, and this will be challenged once the Plant Biosecurity and Invasive Animals Cooperative Research Centres close their doors.

### **Measuring the performance of the national biosecurity system**

- There needs to be greater transparency with data from both the Commonwealth and States. We can only learn from past events if the data is available to be analysed and used.
- There may not be adequate measures in place to determine if IGAB and the national biosecurity system are meeting the objectives set. The documentation is very qualitative with no quantitative measures, so it is unclear whether good measures currently exist.

26 July 2016

*\*Note: reference to Council consultation relates to work done by the Council that included face-to-face discussions with key industry/community/government groups and an online survey completed by more than 300 people.*